

Exhibit I

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

2001 K STREET, NW
WASHINGTON, DC 20006-1047
TELEPHONE (202) 223-7300

DIRECT DIAL: (202) 223-7407
EMAIL: KSMITH@PAULWEISS.COM

NEW YORK
BEIJING
BRUSSELS
HONG KONG
LONDON

LOS ANGELES
SAN FRANCISCO
TOKYO
TORONTO
WILMINGTON

February 7, 2025

VIA MDL CENTRALITY, CERTIFIED MAIL, AND EMAIL

Re: MDL 3084 – Order re Withdrawal of Counsel in Case No. 3:24-CV-05962-CRB, MDLC ID 1982

Dear C.C.,

We write on behalf of our client, Uber Technologies Inc. (“Uber”), regarding *C.C. v. Uber Technologies, Inc., et al.*, 3:24-CV-05962-CRB, MDLC ID 1982, which you filed in *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB (“the MDL”). On January 6, 2025, Pulaski Kherkher, PLLC moved to withdraw its representation of you on the grounds that you have “failed to respond to Counsel’s numerous communication attempts via telephone, email, and text messages” since “October 25, 2024.” *C.C.*, No. 3:24-CV-05962-CRB, ECF 5 at 1 (Exhibit 1). On February 3, 2025, the Court granted that motion. *C.C.*, No. 3:24-CV-05962-CRB, ECF 6 at 1 (Exhibit 2). It is our understanding that you have not found replacement counsel and are no longer represented by an attorney. If that understanding is incorrect, please provide this communication to your attorney, and have your attorney contact us via the information provided above or below as soon as possible.

The Court’s Order states that “Within 28 days of this order, [the] plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If [the] plaintiff does not file that notice, the Court will dismiss their case without prejudice.” Exhibit 2 at 1. The Court also ordered Uber’s counsel to “provide a copy of this order to the plaintiff[.]” *Id.* The Court’s Order is attached to this correspondence as Exhibit 2. Per this Order, you must “file a notice indicating whether [you] intend to pursue the action with new counsel or representing [yourself]” within 28 days of February 3, 2025, i.e. by Monday, March 3, 2025, or else “the Court will dismiss [your] case without prejudice.”

We ask that you please email us confirmation of your receipt of this letter, via email to ksmith@paulweiss.com, lmurray@paulweiss.com, and rcunningham@paulweiss.com, at your earliest opportunity. If you would like to discuss the letter’s contents further, please let us know, and we would be happy to organize a meet and confer.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

C.C.

2

Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

By: /s/ Kyle Smith

Kyle Smith
2001 K Street, NW
Washington, DC 20006
(202) 223-7407
ksmith@paulweiss.com

EXHIBIT 1

D. Douglas Grubbs (*Admitted PHV*)
 Adam K. Pulaski (*Admitted PHV*)
PULASKI KHERKHER, PLLC
 2925 Richmond Avenue, Ste 1725
 Houston, TX 77098
 Telephone: 713-664-4555
 Facsimile: 713-664-7543
 Email: dgrubbs@pulaskilawfirm.com
 Email: adam@pulaskilawfirm.com

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

**MOTION TO WITHDRAW AS COUNSEL
 OF RECORD**

C.C. vs. Uber Technologies, Inc., et al; 3:24-cv-05962

Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel of record for Plaintiff C.C. (“Counsel”), respectfully moves this Court for an Order allowing his firm to withdraw as counsel of record in the above-captioned matter.

Over the past several months, Plaintiff C.C. has failed to respond to Counsel’s numerous communication attempts via telephone, email, and text messages. Counsel last spoke to Plaintiff on October 25, 2024, when he requested Plaintiff’s assistance in obtaining a different format of her ride receipt due to various issues opposing counsel identified during a meet and confer earlier that afternoon. During Counsel’s phone call with Plaintiff, she indicated that she would attempt to find another version of her ride receipt over the weekend. Counsel continued to follow-up with Plaintiff but has not receive a response to date.

1 On November 15, 2024, Counsel advised Plaintiff in writing of his intent to withdraw from
2 this matter via electronic mail if she did not respond by November 25, 2024. At the time of this
3 filing, Plaintiff has still not responded to Counsel. Counsel has advised Defendants of his firm's
4 intent to withdraw from this matter during follow-up meet and confer zoom discussions if he did not
5 hear from Plaintiff.

6 WHEREFORE, the law firm of Pulaski Kherkher, PLLC; and all attorneys of record for
7 Plaintiff request that they be allowed to withdraw as counsel of record for Plaintiff C.C. A copy of
8 this motion will be served upon Plaintiff at her last known address and via electronic mail.
9

10
11 Dated: January 6, 2025

Respectfully submitted,

12 **PULASKI KHERKHER, PLLC**

13 /s/ D. Douglas Grubbs

14 D. Douglas Grubbs (TX Bar No. 24065339)

(Admitted Pro Hac Vice)

15 Adam K. Pulaski (TX Bar No. 16385800)

(Admitted Pro Hac Vice)

16 2925 Richmond Avenue, Suite 1725

17 Houston, Texas 77098

18 Tel: 713-664-4555

Facsimile: 713-664-7543

19 dgrubbs@pulaskilawfirm.com

adam@pulaskilawfirm.com

20 Counsel for Plaintiff
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2025, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: MDL3084-service-Uber@paulweiss.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs

D. Douglas Grubbs (*Admitted PHV*)
Adam K. Pulaski (*Admitted PHV*)
PULASKI KHERKHER, PLLC
2925 Richmond Avenue, Ste 1725
Houston, TX 77098
Telephone: 713-664-4555
Facsimile: 713-664-7543
Email: dgrubbs@pulaskilawfirm.com
Email: adam@pulaskilawfirm.com

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

C.C. vs. Uber Technologies, Inc., et al; 3:24-cv-05962

**[PROPOSED] ORDER GRANTING
WITHDRAWAL OF COUNSEL OF
RECORD**

CONSIDERING the foregoing Motion to Withdraw as Counsel of Record for C.C.

IT IS HEREBY ORDERED that Pulaski Kherkher, PLLC is withdrawn as Plaintiff's counsel of record and shall be relieved of any further responsibility in connection with this action.

Dated: _____

HONORABLE CHARLES R. BREYER
United States District Court Judge

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084

This Order Relates To:

See Attachment

**ORDER GRANTING MOTIONS TO
WITHDRAW**

Re: Dkt. Nos. 2045, 2055, 2056, 2062,
2066, 2068, 2069, 2070, 2081

The above captioned motions to withdraw are granted. Within 28 days of this order, each plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If any plaintiff does not file that notice, the Court will dismiss their case without prejudice.

Uber's counsel shall provide a copy of this order to the plaintiffs and file a declaration within 7 days of this ruling explaining how they did so.

IT IS SO ORDERED.

Dated: February 3, 2025



CHARLES R. BREYER
United States District Judge

ATTACHMENT

This Order relates to:

C.C. vs. Uber, Inc.,
Case No. 3:24-cv-05962-CRB

L.D. v. Uber, Inc.,
Case No. 3:24-cv-05306-CRB

J.H. v. Uber, Inc.,
Case No. 3:24-cv-03441-CRB

C.H. vs. Uber, Inc.,
Case No. 3:24-cv-04363-CRB

R.D. v. Uber, Inc.,
Case No. 3:24-cv-05393-CRB

J.K. v. Uber, Inc.,
Case No. 3:24-cv-05463-CRB

M.P. v. Uber, Inc.,
Case No. 3:24-cv-05688-CRB

T.F. v. Uber, Inc.,
Case No. 3:24-cv-05768-CRB

A.O. v. Uber, Inc.,
Case No. 3:24-cv-05717-CRB